

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION

IN THE MATTER OF THE APPLICATION  
OF THE UNITED STATES OF AMERICA  
FOR A SEARCH WARRANT FOR  
STORED ELECTRONIC  
COMMUNICATIONS STORED AT  
PREMISES OPERATED BY VERIZON  
WIRELESS

MISC. No.

**APPLICATION FOR ORDER COMMANDING VERIZON WIRELESS NOT TO  
NOTIFY ANY PERSON OF THE EXISTENCE OF A SEARCH WARRANT**

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court – based on the information contained in the affidavit accompanying the search warrant – to order Verizon Wireless not to notify any person (including the subscribers or customers of the account listed in the search warrant) of the existence of the search warrant in the above captioned matter until April 12, 2019 or further order of the Court.

The purpose of the Government's request is to protect the information contained within these documents to avoid premature disclosure of the investigation, including by giving targets the opportunity to destroy or tamper with evidence (including electronic evidence), change patterns of behavior, intimidate potential witnesses, and endanger the safety of individuals.

In this case, such an order would be appropriate because the warrant relates to an ongoing criminal investigation that is neither public nor known to the targets of the investigation, and its disclosure may alert the targets to the ongoing investigation. Accordingly, there is reason to believe that notification

of the existence of the search warrant will seriously jeopardize the investigation, including by giving targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, or notify confederates. See 18 U.S.C. § 2705(b).

WHEREFORE, the United States respectfully requests that the Court grant the attached Order directing Verizon Wireless not to disclose the existence or content of the search warrant until April 12, 2019, except that Verizon Wireless may disclose the information to an attorney for Verizon Wireless for the purpose of receiving legal advice.

BETH DRAKE  
UNITED STATES ATTORNEY

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April 12, 2018